UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

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§	No. 24-CV-12586
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<u>DEFENDANT MANPREET SINGH KOHLI'S MOTION</u> FOR EXTENSION OF TIME TO RESPOND

Defendant Manpreet Singh Kohli ("Defendant" or "Kohli"), by and through his attorneys, hereby requests a 7-day extension of the deadline for filing an opposition to the United States' (Department of Justice) Motion for Leave to Intervene [DE 19] (the "Motion"). Movant Department of Justice consents to the relief requested in this motion. In support of this motion, Defendant states the following:

- 1. The Department of Justice filed its Motion on February 7, 2025. The deadline for Defendant to file his opposition to the Motion is currently February 21, 2025.
- 2. Defendant hereby requests a 7-day extension of the deadlines for filing opposition and reply briefing, such that Defendant's opposition would be due February 28, 2025, and the DOJ's reply would be due March 7, 2025.
 - 3. This is the first request Defendant has made to extend time to file this opposition.
- 4. Counsel who is preparing the opposition experienced a sudden bereavement and because of that, needs further time to prepare Defendant's opposition papers.
 - 5. The Department of Justice, through Mr. David Holcomb, consents to this motion.

The undersigned counsel certifies that counsel have met and conferred in accordance with Local Rule 7.1(a)(2) and Movant consents to the extension of time.

Respectfully submitted,

/s/ Eric S. Rosen Eric S. Rosen DYNAMIS LLP 225 Franklin St., 26th Floor Boston, MA 02110 (646) 541-8484 erosen@dynamisllp.com

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2025, a true and correct copy of the foregoing document was filed electronically through the Court's ECF/CM system which caused service upon all counsel of record to the email address so designated by them for service.

/s/ Eric S. Rosen

Eric S. Rosen
DYNAMIS LLP